

BEFORE THE PUBLIC UTILITIES COMMISSION OF
THE STATE OF CALIFORNIA



FILED

01-18-08
04:59 PM

Order Instituting Rulemaking Into
Implementation of Federal
Communications Commission Report and
Order 04-87, as it Affects the Universal
LifeLine Telephone Service Program.

Rulemaking 04-12-001

(Filed December 2, 2004)

**REPLY COMMENTS OF THE UTILITY REFORM NETWORK, THE
NATIONAL CONSUMER LAW CENTER, DISABILITY RIGHTS ADVOCATES
AND THE LATINO ISSUES FORUM ON ASSIGNED COMMISSIONER'S
RULING SETTING SCOPE OF PHASE 2 ISSUED NOVEMBER 14, 2007**

Christine Mailloux
Telecommunications Attorney
TURN
711 Van Ness Avenue, Suite 350
San Francisco, CA 94102
(415) 929-8876, Ext. 353
(415) 929-1132 (fax)
cmailloux@turn.org

Melissa W. Kasnitz
Managing Attorney
Disability Rights Advocates
2001 Center Street, Third Floor
Berkeley, California 94704-1204
(510)665-8644
(510)665-8511 (fax)
pucservice@dralegal.org

Olivia Wein
Staff Attorney
National Consumer Law Center
1001 Connecticut Avenue, NW, Suite 510
Washington, DC 20036
(202) 452-6252, Ext. 103
(202) 463-9462 (fax)
owein@nclcdc.org

Enrique Gallardo
Staff Attorney
Latino Issues Forum
160 Pine Street, Suite 700
San Francisco, CA 94111
(415) 547-7550
(415) 284-7222 (fax)
lifcentral@lif.org

January 18, 2008

TABLE OF CONTENTS

I.	INTRODUCTION.....	1
II.	PREQUALIFICATION IS NOT THE SOLUTION TO ANY VERIFIED PROBLEM WITH LIFELINE.....	2
A.	General Issues Concerning Prequalification.....	2
B.	Joint Consumer Responses to Specific Issues Regarding Prequalification Raised in Opening Comments.....	5
i.	Prequalification is not mandatory.....	5
ii.	Verizon’s Affordability Study should be given little weight.....	5
iii.	The amounts of money at issue are significant to low income consumers.....	6
iv.	Efforts to promote synergies with other programs should not be used to justify prequalification.....	7
v.	Prequalification is not in the interest of low income consumers.....	7
III.	THE PRINCIPLE OF UNIVERSAL SERVICE WOULD BE COUNTERMANDED BY THE ELIMINATION OF INCOME-BASED ELIGIBILITY.....	8
IV.	THE COMMISSION SHOULD PHASE-IN COORDINATION WITH OTHER COMMISSION LOW-INCOME PROGRAMS IN SHORT-TERM AND LONG-TERM STEPS.....	13
A.	Measures Possible in the Short-Term.....	14
B.	Longer-Term Measures.....	16
V.	WEB-BASED SYSTEM / SYNERGIES WITH OTHER PROGRAMS.....	20
VII.	CONCLUSION.....	22

I. INTRODUCTION

Before taking any action on the issues raised in the Assigned Commissioner's Ruling on November 14, 2007, the Commission must keep in mind the primary reason why this proceeding was re-initiated: the low response rates in the LifeLine certification and verification processes.¹ In this phase of the proceeding, the Commission first considered short-term solutions to the challenges that resulted after the implementation of D.05-04-026 and D.05-12-013. The Commission now turns to considering long-term strategies. However, as Joint Consumers² demonstrate below, two proposed strategies, prequalification and the elimination of income-based enrollment, do not address any of the causes for the low response rates. Moreover, these two strategies would actually deter many eligible participants from applying for LifeLine, or remove options through which they could demonstrate eligibility, contradicting the initial rationale for the re-initiation of this proceeding. The Commission cannot rely on unsupported assertions of greater efficiency or reduced costs over clear indications that these strategies will deny eligible people the LifeLine benefit. The Commission should decline to enact these drastic long term strategies before the parties to this proceeding can observe the results of the short-term strategies enacted in the earlier phase, or before the response rates for the certification and verification processes improve.

¹ See Assigned Commissioner's Ruling Temporarily Suspending Portions of General Order 153 Relating to the Annual ULTS/California LifeLine Verification Process, filed November 1, 2006, p. 1 ("We are experiencing a very low response rate to the LifeLine verification notice, which results in significant numbers of current LifeLine customers being removed from the program. This hiatus in the verification process will allow staff and interested parties an opportunity to isolate the reasons for the low response rate and to take steps to solve the problem."); see also Assigned Commissioner's Ruling Setting Scope of Phase 2, filed November 14, 2007, pp. 1-2.

² Joint Consumers consists of Disability Rights Advocates, Latino Issues Forum, National Consumer Law Center, and The Utility Reform Network.

While opposing these counterproductive suggestions, Joint Consumers support strategies that are actually directed at improving response rates and increasing enrollment. The Commission should develop means of coordinating the LifeLine enrollment process with other low-income programs. Joint Consumers suggest short-term steps that may be enacted immediately, as well as long-term steps that need further consideration. Joint Consumers also support and suggest parameters for a web-based system of enrollment. These measures advance the purpose of this proceeding as well as the universal service principles of the LifeLine program.

II. PREQUALIFICATION IS NOT THE SOLUTION TO ANY VERIFIED PROBLEM WITH LIFELINE

A. General Issues Concerning Prequalification

As the Commission and parties to this proceeding are well aware, the LifeLine program was created to keep low income customers connected to the phone network.³ It would defeat the purpose of the program if the Commission were to increase the up front costs of phone service for every LifeLine applicant. But that is just what would happen under prequalification. While advocates for prequalification can point to the current threat of back billing experienced by those customers who do not ultimately qualify for LifeLine, there is no denying that prequalification raises the cost of the program for *everyone who applies to participate*. While customers who eventually qualify for LifeLine may ultimately get some of their money back in the form of a credit on their bill, once that money is paid to the carrier (in some cases almost \$100) it cannot be used

³ “Every means should be employed by the commission and telephone corporations operating within service areas which furnish LifeLine telephone service to ensure that every person qualified to receive LifeLine telephone service is informed of and is afforded the opportunity to subscribe to that service.” Cal. Public Util. Code § 871.5(c).

for food, medicine or other necessities, requiring the low income customer to make a tough choice.

Joint Consumers understand that neither scenario -- the back billing associated with unsuccessful applicants who are given the LifeLine discount on first contact or the up front costs associated with prequalification -- is ideal. But based on the Opening Comments, Joint Consumers point out that there is not enough record evidence or policy justification to move to a prequalification system today. While carriers talk informally about back billing problems of up to \$100 per customer, none of the carriers' Opening Comments attempted to document or quantify their own customers' experience with back billing. Further, there is no evidence that the back billing going on today is the result of a systemic, permanent situation that must be addressed in a radical manner.⁴ While everyone can agree that the past year has seen several bumps in the process, causing some customers to experience high back billing, there is no indication that this problem will continue once the current processes that have been refined through substantial work and effort by the Commission, the carriers, consumer groups, and Solix, are allowed to work properly. Joint Consumers also note that due to complications with the LifeLine marketing contracting process, there has been a delay in the rollout of robust LifeLine marketing. The marketing contract RFP will be reissued in the near future, so it will be months, at best, before California's low-income consumers will begin to benefit from aggressive education and outreach on the revamped LifeLine program. This is not to take

⁴ AT&T and Verizon, in their Opening Comments, stated that 50% of certification applicants are ultimately deemed ineligible. (Verizon Opening at p.3, AT&T Opening at p.1.) However, many of those 50% are people that did not complete the application process successfully. Everyone's goal is to have that number drastically reduced by increasing consumer education on the process, facilitating the process through web applications and possibly tweaking the system so the process is smoother. It is also unclear how many of these ineligible customers are really the victim of poor recordkeeping and other hiccups in the system over which the customer has no control. These problems should all be reduced over time.

away from the important and good work of the parties who have made substantial efforts to reach out to existing LifeLine customers, but much work remains to be done regarding outreach and education, especially on eligibility criteria and the consequences for failure to complete the application process.

Cox not only agrees that the process needs to be left to work on its own before making significant changes, but points out other concerns with the proposed move to prequalification. In its Opening Comments, Cox provides the frank observation that the ongoing instability in the program has made it difficult for carriers to implement the program, requiring significant resources to fix the practices and procedures.⁵ To introduce yet another significant change at this juncture would be imprudent, especially because, as Cox notes, the need for the change has not been proven. In addition, Cox points out that the Commission is considering significant changes to the program in other dockets that should be completed before a move to prequalification is made. Finally, Cox believes more work needs to be done to determine if a prequalification system would benefit the consumers. Joint Consumers wholeheartedly agree on these points and urge the Commission to weigh them heavily.

If the current certification and verification processes are shown to be the problem (e.g. long application processing time that allows ineligible customers to accumulate large amounts of improper discounts), then the processes should be reviewed and changed. As stated in Opening Comments, the proposal to impose a prequalification requirement is a drastic change that will adversely affect every single applicant to the LifeLine program. However, back billing concerns only affect those ultimately found ineligible. The Commission should not use a sledgehammer to fix something that may

⁵ Cox Opening at p. 3.

more appropriately require a scalpel, and should look to a more limited solution to the back billing problem such as changes to the application time line.

B. Joint Consumer Responses to Specific Issues Regarding Prequalification Raised in Opening Comments

i. Prequalification is not mandatory

In its Opening Comments, Verizon claims that the Commission is legally obligated to change to a prequalification system for income-eligible applicants.⁶ As pointed out by Cox in its Opening Comments, this issue was exhaustively debated in previous phases of this proceeding, and a first contact process was found to be in compliance with the FCC's rules.⁷ In D.05-12-013, adopted in this docket, the Commission included Conclusion of Law 2:

The FCC's rules allow us the flexibility to craft a California approach that will allow customers to be enrolled at the point of the first customer contact.

Joint Consumers understand that Commission staff worked with the FCC staff and reached a *mutual* understanding that first contact processes would satisfy the federal rules. The legal issue is settled on this point and supports first contact.

ii. Verizon's Affordability Study should be given little weight

In support of prequalification, Verizon cites to a 2004 Affordability Study to claim that low income customers can afford to pay additional money up front when signing up for service.⁸ In other dockets, TURN has strongly criticized the use and analysis of this study by Verizon. Verizon and AT&T have used this Study in other proceedings to try to support their claims that customers can pay more for phone service,

⁶ Verizon Opening at p. 4.

⁷ Cox Opening at p. 2.

⁸ Verizon Opening at p. 5

including higher non-recurring charges. In R.06-05-028, the Commission's docket on Public Purpose Programs, TURN's expert, Dr. Trevor Roycroft, filed an Affidavit that not only discussed the limitations of the Study generally, but also concluded that Verizon "misquotes or misinterprets important information contained therein."⁹ The Commission should give limited weight to Verizon's use of the Study in this proceeding.

iii. The amounts of money at issue are significant to low income consumers

It should not go unnoticed that SureWest and the Small LECs and Joint Consumers attempted a very similar analysis to prove very different points. On page 4 of their Opening Comments, SureWest and the Small LECs work through a scenario showing how much a consumer would pay up front to his or her carrier under both the prequalification and first contact scenarios.¹⁰ Joint Consumers did something similar on page 7 of our Opening Comments. SureWest and the Small LECs calculated these numbers to demonstrate the potential back billing amounts for a customer found ineligible for LifeLine after a three month period of receiving discounts. Joint Consumers demonstrated how much additional money, up front, SureWest and AT&T applicants to the LifeLine program would pay to set up service in a prequalification environment. Joint Consumers calculated that a SureWest customer would pay almost \$100 more up front for phone service than a LifeLine customer. As SureWest and the Small LECs have acknowledged, this amount of money is a huge barrier for low income

⁹ R.06-05-028, Reply Comments of the Utility Reform Network and National Consumer Law Center, Affidavit of Trevor Roycroft at p. 4, September 15, 2006.

¹⁰ It was difficult to get an apples to apples comparison. For example, SureWest and Small LECs did not include possible deposit amounts that a customer would have to pay if deemed a credit risk that would otherwise be waived automatically if the customer was a LifeLine customer. That would increase the amount a SureWest and Small LECs customer would have to pay by at least \$38. In its calculations, Joint Consumers used a \$49 connection/installation fee for a SureWest and Small LECs customer found on the SureWest and Small LECs web site. SureWest and Small LECs, however, used a \$25 connection fee from its tariff (CAL P.U.C. Schedule A.28, Sec. 28.2.1.). It is unclear which connection fees would apply.

customers, potentially forcing many to forego phone service because they cannot afford such one-time expenditures.¹¹ Joint Consumers note that such a scenario is exactly what the LifeLine program is designed to prevent, and, if the program is set up in such a way to generate these fees, it prequalification process would undermine the fundamental purpose of the low income program generally.

iv. Efforts to promote synergies with other programs should not be used to justify prequalification

Joint Consumers take issue with the Joint Utilities over simplified advocacy of prequalification.¹² The Joint Utilities' main motive appears to be their statement that a prequalification system would "better-align" the LifeLine program with the CARE program. As discussed below, Joint Consumers are strong supporters of harnessing synergies among the various low income programs in the state to benefit consumers and eventually create a streamlined process that will simplify applications for all of the programs. However, moving to prequalification to facilitate this future goal is premature and counterproductive. There are many issues, not just prequalification, to be addressed before moving to a combined application process. Nevertheless, as discussed below, the Commission does not need prequalification to move forward. Joint Consumers believe that even in a first contact environment for LifeLine, there are some things that can and should be done right now to work with the other programs under a first contact process.

v. Prequalification is not in the interest of low income consumers

While Joint Consumers appreciate the proposals of some carriers to "mitigate" the impacts of a prequalification process, such proposals demonstrate that prequalification may be in the carriers' best interest, but it is not in the customers' best interest. If a

¹¹ SureWest and Small LECs Opening at p. 4.

¹² Joint Utilities Opening at pp. 1-2.

prequalification system is adopted, SureWest and the Small LECs' proposals that the certification process be streamlined to one month, payment of connection fees be spread out over three months and additional methods of application be developed would not only help, but be required to protect the goals and integrity of the LifeLine program. Importantly, these efforts would also likely reduce the amount of back billing that may happen, since ineligible customers would be taken off the program faster, thereby eliminating a need to move to prequalification.

Perhaps SureWest and the Small LECs said it best with the euphemistic statement that customers would be "encouraged" to send in their paperwork in a timely fashion under a prequalification system in order to receive their credits.¹³ Joint Consumers would put it a slightly different way. Under a prequalification system, customers would be forced to pay money they do not owe as LifeLine customers, and can only cross their fingers that once they've submitted their paperwork the process (over which they generally have no control) goes smoothly so they can get reimbursed as quickly as possible.

III. THE PRINCIPLE OF UNIVERSAL SERVICE WOULD BE COUNTERMANDED BY THE ELIMINATION OF INCOME-BASED ELIGIBILITY.

Some parties argue that elimination of income-based eligibility would lead to simplification and greater efficiency in the certification and verification processes.¹⁴

These parties ignore the operating principle of California's LifeLine program that:

[e]very means should be employed by the commission and telephone corporations operating within service areas which furnish lifeline telephone service to ensure that every person qualified to receive lifeline telephone service is informed of and is afforded the opportunity to subscribe to that service. (Cal. Public Util. Code § 871.5(c)).

¹³ SureWest and Small LECs Opening at p. 5.

¹⁴ See Verizon Opening at pp. 6-7; AT&T Opening at pp. 6-7.

Elimination of income-based eligibility would remove a significant and long-standing means through which Californians subscribe to LifeLine and would violate § 871.5(c). Program-based eligibility alone cannot achieve California's objective of universal service. As many parties state, the Commission should not make a change to the LifeLine eligibility processes without reliable evidence that use of only program-based eligibility can satisfy California's universal service principles.¹⁵

AT&T argues that the percentage of Ohio LifeLine participants who enrolled through income-based criteria diminished from 20% in 2004 to 4% in 2007 after Ohio's implementation of Federal Communications Commission Report and Order 04-87 eliminating self-certification.¹⁶ Based on this data, AT&T posits that California can eliminate income-based eligibility without losing eligible customers.¹⁷ However, there is nothing to show that those income-eligible participants lost in Ohio were able to certify through program-based eligibility. These eligible participants may have simply stopped participating in the program. Certainly, as the past months have demonstrated, subsequent to California's implementation of FCC Order 04-87, a significant and troubling number of previously self-certifying income-eligible participants have dropped from the program. The data from Ohio does not in any way demonstrate that most of the participants using income-based enrollment will simply switch to program-based enrollment.

As Joint Consumers pointed out in Opening Comments, income-based enrollment onto LifeLine is currently utilized by a significant number, 20% of program participants

¹⁵ See Cox Opening at p. 4; SureWest and Small LECs Opening at p. 7; Joint Utilities Opening at p. 3.

¹⁶ See AT&T Opening at p. 6.

¹⁷ See *id.* at p. 7.

in California.¹⁸ AT&T states that removing income-based enrollment will allow applicants to realize the convenience of program-based enrollment and make a switch.¹⁹ It is ironic that AT&T is suggesting that a reduction in flexibility and choices for the LifeLine program will somehow increase a customer's convenience. Nevertheless, it should be the customer who decides which method of qualification is most convenient. Indeed, the convenience of program-based enrollment is *currently* available to applicants, yet a significant percentage of participants continue to utilize income-based enrollment. This option should remain open to them.

Joint Consumers do not accept that the Ohio data demonstrate that Ohio's previously income-certifying participants are largely transitioning to program-based eligibility. However, assuming that the data from Ohio demonstrated this transition, there is nothing to show that this would be the case in California as well. California and Ohio have very different populations and situations. One indication of a significant difference is that, subsequent to implementation of FCC Order 04-87, only 4% of Ohio's applicants continued to utilize income-based enrollment (which could still represent thousands of consumers), whereas California's applicants continue to utilize income-based enrollment at a much higher rate of 20%. California also has a much larger low-income population than Ohio, so the actual number of applicants who may opt to use income-eligibility is also higher. There must be a reason for this significant difference.

One reason may be that California has a much greater population of undocumented immigrants, both in terms of absolute numbers and as a percentage of the

¹⁸ This estimate was provided by a Solix representative at the December 5, 2007 Implementation Working Group conference call.

¹⁹ See AT&T Opening at p. 6.

total population.²⁰ Most of the programs through which LifeLine eligibility may be established are unavailable to undocumented immigrants.²¹ Moreover, undocumented immigrants who do not have children in the household are not eligible for *any* of the programs – elimination of income-based eligibility would mean elimination of this significant category of LifeLine eligible participants.²² For a significant number of persons, income-based processes are the only means of establishing LifeLine eligibility.

Verizon points out that some potentially eligible persons, particularly undocumented immigrants, live in a cash economy, may not have appropriate proof of income, and thus would have difficulty applying to LifeLine through income-based enrollment.²³ While this may be true, such persons marginalized from the mainstream economy are also likely to not participate in government public benefits programs or may be ineligible for the programs, as shown above. Undocumented immigrants, and even documented immigrants, both of which California has in disproportionate numbers relative to population, participate in public benefits programs at a lower rate than other low-income citizens.²⁴ One of the reasons that undocumented immigrants do not apply for public benefits is because of restrictions against *documented* immigrants' receipt of

²⁰ California's undocumented population was estimated at 2,400,000 and Ohio's at 100,000-150,000 in 2002-2004. See Estimates of the Size and Characteristics of the Undocumented Population, Pew Hispanic Center, March 2005, Table 1. The report is available at <http://pewhispanic.org/files/reports/44.pdf>. California's general population is 33.87 million and Ohio's is 11.35 million, based on 2000 Census data.

²¹ Undocumented immigrants are only eligible for the National School Lunch Free Lunch Program, Women, Infants and Children and Healthy Families Category A. See Verizon Opening at p. 8.

²² While the exact number of undocumented households without children in California is not known, the number should be significant given the estimated population of 2,400,000 undocumented residents in California. See n. 20

²³ See Verizon Opening at p. 8

²⁴ See Facts About Immigrants' Low Use of Health Services and Public Benefits, National Immigration Law Center, September 2006, p. 1. For example, although non-citizens constitute 8% of the U.S. population (and more of the low-income population) non-citizens are only 3% of the recipients of Food Stamps in the U.S. See *id.*, p. 2.

public benefits, or because of misunderstanding of these restrictions.²⁵ These immigrants, documented and undocumented would be cut off from access to LifeLine if income-certification were eliminated.

Verizon states that immigrants from countries where residents have a distrust of government may not be willing to supply income information to the phone company, which may be identified as a government entity.²⁶ However, such persons would also be much less likely to enroll in public benefits programs and supply documentation to an actual government agency. For individuals in a cash economy without paychecks, income-based LifeLine enrollment is still a potential option, if they file income tax returns.²⁷ Income-based enrollment is the only enrollment option for many people on the fringes of California's economy.

SureWest and the Small LECs point out that as more applicants utilize any new systems put in place to streamline enrollment in LifeLine, the number of participants who utilize income-based certification may diminish, but the Commission should not eliminate this option at the current time.²⁸ Joint Consumers agree with many parties that greater efficiency may result from greater reliance on revised certification and enrollment processes such as automatic enrollment and web-based enrollment. However, income-based enrollment must not be eliminated.²⁹

²⁵ See *id.*, p. 3. For example, most documented immigrants cannot receive federal Medicaid, TANF, Food Stamps, or SSI during their first five years or longer in the U.S., regardless of how much they have worked or paid in taxes.

²⁶ See *id.*

²⁷ Undocumented immigrants may file income tax returns using a tax payer identification number in lieu of a social security number.

²⁸ See SureWest and Small LECs Opening at p. 7.

²⁹ While income-based enrollment may not be as efficient as program-based enrollment, smaller numbers of applicants utilizing income-based enrollment will result in lower costs to process these applications.

The existence of an income-based enrollment processes in no way deters the development of web-based enrollment, automatic enrollment or any other efficient enrollment process. The Commission should encourage such programs to develop without eliminating income-based enrollment. AT&T argues that the existence of income-based enrollment prevents a more efficient paper application process for program-based enrollment.³⁰ The Commission may easily streamline the paper application process for program-based enrollment without eliminating income-based enrollment. Joint Consumers support the development of more efficient LifeLine application and enrollment processes. However, income-based enrollment in no way prevents this development and should not be eliminated.

IV. THE COMMISSION SHOULD PHASE-IN COORDINATION WITH OTHER COMMISSION LOW-INCOME PROGRAMS IN SHORT-TERM AND LONG-TERM STEPS

While many of the parties were supportive or noted the benefits to coordination with other low-income programs,³¹ many of the Opening Comments focus on a longer-term synchronization of the Commission's low-income programs. Parties focused on more long-term measures of a single application,³² and synchronized databases,³³ and focused on discrepancies between eligibility criteria in various programs and on privacy concerns.³⁴ More complete synchronization with other low-income programs would greatly benefit California's low-income utility consumers. Nevertheless, and as other parties have noted, this is a huge undertaking that will require additional attention

³⁰ See AT&T Comments at p. 6

³¹ Joint Consumers Opening at p.13; AT&T Opening at p.8; Division of Ratepayer Advocates Opening at p. 7. Joint Utilities at p.3.

³² Verizon Opening at p. 9; DRA Opening at p. 7.

³³ AT&T Opening at 8.

³⁴ AT&T Opening at 8; Verizon Opening at 9; Joint Utilities at pp. 3-4; Division of Ratepayer Advocates Opening at pp.7-8.

(possibly through workshops or through a separate proceeding, as recommended by several parties). Joint Consumers, however, note that the ACR asked much broader questions: “*how we might tie in with other low-income programs*” (ACR at p. 7) and “Is there *some way* that a customer could sign up for all low-income programs administered by the Commission at one time?” (emphasis added) (ACR at p. 7).

A. Measures Possible in the Short-Term

Joint Consumers urge the Commission to act immediately on several simple measures to “tie in” LifeLine with other low-income programs. At the outset, coordinated outreach and education about the various utility assistance programs is an immediately achievable goal. The Commission could develop a brief document that describes each existing low-income utility assistance program, including LIHEAP, along with a very brief description of where the consumer can go for more information on a particular program. The Commission could then strongly encourage each of the entities administering these programs (companies, agencies and agents of the Commission) to use this as part of their outreach materials. These agencies and companies could also list this information on their websites, as could the Commission. Utilities, community-based organizations and Commission staff and contractors working on low-income outreach could jointly sponsor a booth at community events to promote the program and distribute synthesized information about the programs in other ways. Energy, telephone and water companies and Commission staff could sponsor and/or hold joint trainings for front-line poverty groups about all the utility low-income assistance programs. Joint Consumers also urge that the state’s Low Income Home Energy Assistance Program (LIHEAP) be included in these efforts, since this is a large federally funded energy assistance program

that could serve some consumers who are not familiar with all of the Commission's low-income utility assistance programs.

Another measure that is possible in the short-term is to encourage water and energy utilities to promote the LifeLine program on their applications.³⁵ Joint Consumers note that PG&E's CARE/FERA program application for single-family customers (rev. 06/01/07) has a section on the form that lists other utility payment assistance programs and services for which the applicant may qualify, including LIHEAP (refers customers to the Department of Community Services and Development and provides a number for more information) and ULTS (tells customers to call their local phone company for more information). Sempra Energy's CARE application (form 6491-B (12/07) EN) also contains similar information on LIHEAP and ULTS. San Diego Gas and Electric's brochure/application for CARE & FERA also contains a section entitled, "You May Also Qualify For," which lists programs such as LIHEAP (refers customers to the Department of Community Services and Development and provides a number for more information) and California LifeLine/ULTS (refers customers to their local phone company for more information). Other energy utilities such as Southern California Edison's CARE application (Rev 6/07) and Southwest Gas Corporation have a sentence after the signature line regarding "Other Programs and Services You May Qualify For" that lists LIHEAP. Such forms could readily be modified to also include the LifeLine program similar to PG&E's, SDGE's and Sempra's applications.

In return, the LifeLine application could be modified to also include a section regarding "Other Programs and Services You May Qualify For:" that includes CARE,

³⁵ Joint Utilities state that without further Commission direction in R.07-01-042, they could automatically enroll some California LifeLine customers who participate in certain public assistance programs because they are currently being accepted by the utility programs. (Joint Utilities Opening at p. 3)

LIEE, LIHEAP and the low-income water assistance programs (LIRA).³⁶ This measure, which takes the opportunity to promote other low-income utility assistance programs to potentially receptive consumers who already have an interest in one utility assistance program, LifeLine, is one that can be accomplished in the very short-term.

As for whether there is “*some way* that a customer could sign up for all low-income programs administered by the Commission at one time” (emphasis added) (ACR at p. 7), Joint Consumers point to the invaluable role that community based organizations (CBOs) can play as front line outreach for these low-income programs. Joint Consumers have been pressing for a larger role for CBOs in the outreach and education of LifeLine, and we urge the Commission to work with the LifeLine Marketing contractor and the energy and water utilities to find ways to coordinate outreach work with the CBOs.

B. Longer-Term Measures

Joint Consumers have noticed that in other states, LIHEAP program applications have gone further than merely seeking to educate consumers regarding other utility low-income assistance programs, as recommended above in the short-term measures section. These other states actively facilitate enrollment of LIHEAP customers into their LifeLine programs. In Opening Comments, Joint Consumers pointed out one important synergy is the sharing of information regarding enrolled low-income program customers between utilities.³⁷ Several state LIHEAP programs have included a section on their application form that would allow a LIHEAP applicant to clearly indicate permission to share personal information for the purpose of facilitating enrollment in LifeLine (as LIHEAP

³⁶ Joint Utilities ask customers to share their information for enrollment in other programs, but no such provision is being required of California LifeLine (Joint Utilities Opening at p. 4)

³⁷ Joint Consumers Opening at pp.13-14.

enrollment automatically qualifies a customer for LifeLine in those states). For example, in New Mexico, the LIHEAP application contains a brief section about that state's Low Income Telephone Assistance Program (LITAP):

LITAP - Low Income Telephone Assistance Program - Households who receive LIHEAP or have a member who receives Medicaid are eligible for discounts on hook up and/or monthly service.		Telephone Company Code
Home Telephone Number ()	Your Telephone Company	
If my family is eligible for LIHEAP, I give HSD permission to tell my telephone company that my family is eligible for the Low Income Telephone Assistance Program discount. Initial to give permission _____.		

New York's LIHEAP application contains the following language regarding LifeLine:

<p>LIFELINE - If you are applying for Lifeline the Office of Temporary and Disability Assistance may or may not release your name and address to your telephone service provider. Your telephone service provider may or may not use this information to enroll you in their Lifeline Service for a discounted telephone rate.</p> <p>If you do not want this information released, check this box <input type="checkbox"/> .</p> <p>You may contact your telephone service provider directly for enrollment in the discounted rate Lifeline Service.</p>

Vermont's LIHEAP application contains the following language regarding LifeLine:

Telephone Lifeline - monthly credit on your home phone bill. The phone number must be listed in your name, or you must pay part of the bill.

If you do not receive a Lifeline credit, do you want to apply? ☐ Yes (complete below) ☐ No

Account number from your bill _____

Name of the phone company _____

Last name of person whose name is on bill _____

Customer number (Verizon Customers only) _____

If you check Yes to Lifeline and you qualify, we will send your name, address, phone number and other information to the phone company. They may contact you for more information. If you have more questions about Lifeline, contact your phone company.

Massachusetts' LifeLine application contains the following language regarding information sharing for heating and utility benefits:

AUTHORIZATION - INFORMATION SHARING FOR HEATING AND UTILITY DISCOUNTS AND BENEFITS

I authorize the **AGENCY** to provide my heating company/utility and my secondary energy company/utility with information concerning my Fuel Assistance application if this could result in a discounted heating/energy bill.

*I further authorize the **AGENCY** to share my name and address, identifying me as a Fuel Assistance recipient, with my telephone and other supplier/company/utility information if this could result in a discount or*

*other benefit from the supplier/company/utility. The **AGENCY** may also request that I supply account number information for this purpose.*

I understand that this authorization is for my benefit and I do not have to agree in order to receive assistance under this application. I have read the above authorization and agree to its terms; however, if I do not agree, I will so indicate on the front of this **application** (under the Applicant Signature section) in accordance with instructions from the **AGENCY**.
(italics added)

Joint Consumers urge the Commission to reach out to the Department of Community Services and Development to seek their cooperation in modifying their LIHEAP application to include a brief section, along the lines of what the other state LIHEAP programs cited above have done, to promote the sharing of LIHEAP customers' information with Solix for the sole purpose of enrollment into the LifeLine program.

Such efforts would be permissible and helpful to consumers. Nevertheless, Verizon attempts to put the brakes on coordination of low-income programs by mistakenly assuming that eligibility for CARE and LIEE is based on self certification of income.³⁸ Joint Utilities respond that CARE eligibility is based on self certification of program participation as well as income (subject to random income verification) and that LIEE allows for qualification based on participation in a means tested program or documentation of income eligibility except in geographical areas targeted by the utility where demographics indicated customers in those areas meet the income eligibility guidelines (in those limited instances, self-certification is allowed).³⁹ Indeed, there is a large area of overlap between the CARE, LIEE, LIRA (which tend to rely on CARE

³⁸ Verizon Opening at p. 9.

³⁹ Joint Utilities Reply at p.3.

eligibility criteria) and LifeLine eligibility, and this area of overlap is where coordination of the programs should first be focused.⁴⁰

Other parties have recommended a separate proceeding and/or workshops to pursue synergies of utility low-income programs.⁴¹ Joint Consumers are not opposed to this for the development of longer-term measures such as those described above, and the consumer groups would be active participants in such further proceedings. However, Joint Consumers do not believe that this separate track would be necessary to initiate the types of measures listed above that are achievable in the near future. We urge the Commission to begin implementing those measures as soon as possible for the convenience and benefit of low-income consumers in California.

⁴⁰ Areas of Program Overlap (in bold):

Program Eligibility

<u>CARE</u>	<u>CA LifeLine</u>
Medi-Cal	Medicaid/ MediCal
Food Stamps	Food Stamps
TANF	TANF
WIC	WIC
LIHEAP	LIHEAP
Healthy Families A&B	Healthy Families A
	SSI
	Federal Public Housing Assistance (Sect.8)
	NSL
	Tribal TANF
	BIA GA
	Tribal Head Start
	Tribal NSL

LifeLine income eligibility is less than CARE and LIEE, so income eligible LifeLine customers could be enrolled in CARE and LIEE, while income-eligible CARE and LIEE customers could be targeted for LifeLine outreach since there are those customers who will be above the income cut-off.

⁴¹ Joint Utilities Reply at p. 2; AT&T Opening at p. 9; Division of Ratepayer Advocates Opening at p.7.

V. WEB-BASED SYSTEM / SYNERGIES WITH OTHER PROGRAMS

None of the parties expressed opposition to a web-based system that might provide synergies with other low-income programs;⁴² Joint Utilities have suggested additional Commission workshops to determine viability, design, implementation and cost details for such a system. Likewise, the Division of Ratepayer Advocates urges the Commission to implement a workshop to explore this issue in more detail, while explaining that it cannot adequately assess the existing system nor compare it to other states until Solix has released its fully developed version.

Joint Consumers are mostly in agreement with DRA and Joint Utilities, in that we believe that the ideal LifeLine web-based system should provide an online enrollment application, and the eventual goal should be an online universal point of entry for all consumers to access multiple low-income programs. Joint Consumers also note that other state web-enrollment sites have features that the Commission should also consider, such as the option for consumers to make a preliminary determination of whether they believe they are eligible for a benefit.⁴³ Nevertheless, Joint Consumers recognize that even an effective web portal only for LifeLine is not a simple feat. Creating such a portal would require sustained attention and likely one or more workshops to address issues such as who could access the site, how many times an applicant could access the site to complete an application, whether the applicant would be able to use the site to make a preliminary determination as to whether he or she was eligible (especially important in catching those just above the income eligibility cut off), whether the applicant would have the ability to signal to the Administrator that pre-entered information is incorrect (e.g., spelling of

⁴²Some Parties did, however, express concerns about incompatible eligibility standards between those programs, as discussed further in section IV, *supra*.

⁴³ Joint Consumers Opening at pp. 14-17.

customer name, customer address, current local provider), and other technical and substantive issues. A broader portal would likely require a separate proceeding to address additional issues such as privacy and security of personal data concerns and qualification criteria. Joint Consumers would support all of these efforts. However, Joint Consumers do not want the complexity of the eventual goals to be used as an excuse to limit immediate action.

Further, Joint Consumers echo the Division of Ratepayer Advocates in its comment that a web-based system cannot and should not be the only, or even primary, means of enrollment for low income consumers. Joint Consumers believe that the Commission must still make available all the traditional mail-in forms, not least because low-income consumers are likely to be on the wrong side of the “digital divide,” and web systems as currently under discussion would not necessarily permit CBOs to effectively assist consumers in completing an online application. Moreover, any web-based system must be accessible to screen readers as the Commission moves forward with LifeLine (and the other low-income programs).

While considering these issues and moving to implement them, Joint Consumers believe that the Commission must develop an interim solution during the course of the current proceeding. This could be a central web portal that is, if nothing else, a place to compile information regarding the various low-income programs in one convenient location. In addition, some tool to allow consumers to check and see if they are income-eligible (with clear notices that this is merely a tool to assist consumers and not an official eligibility determination) would be an added benefit. An information portal should not be complicated nor expensive for the Commission to develop and promote, and would

provide a valuable tool to some low-income consumers, and most particularly the CBOs that serve those consumers. The website could also include simple but important features such as, e.g. a box for consumers to check to indicate interest in related low-income programs, and contact information for consumers to initiate the application process.

VII. CONCLUSION

The Commission cannot enact prequalification or eliminate income-based enrollment, measures that would deter eligible participants from applying to the LifeLine program. Joint Consumers dispute the supposed benefits of efficiency and cost savings that supporters of these measures tout. However, even if some of these benefits exist, they are outweighed by the tens of thousands of eligible applicants that would be eliminated from the program. Rather, the Commission should seek greater efficiency in enrollment procedures in a positive manner, by seeking to coordinate enrollment processes with other low-income programs and by enacting a web-based enrollment system.

January 18, 2008

Respectfully Submitted:

/s/

By Melissa W. Kasnitz, On Behalf of
Joint Consumers

Disability Rights Advocates
2001 Center Street, Third Floor
Berkeley, CA 94705
pucservice@dralegal.org

Christine Mailloux
TURN
711 Van Ness Avenue, Suite 350
San Francisco, CA 94102
cmailloux@turn.org

Enrique Gallardo
Latino Issues Forum
160 Pine Street, Suite 700
San Francisco, CA 94111
lifcentral@lif.org

Olivia Wein
National Consumer Law Center
1001 Connecticut Ave, NW, Ste 510
Washington, DC 20036
owein@nclcdc.org

CERTIFICATE OF SERVICE

I certify that I have, by electronic mail to the parties to which an electronic mail address has been provided, served a true copy of “Reply Comments of the Utility Reform Network, The National Consumer Law Center, Disability Rights Advocates and The Latino Issues Forum on Assigned Commissioner’s Ruling Setting Scope of Phase 2 Issues November 14, 2007,” on all known parties on R.04-12-001.

Dated January 18, 2008 at Berkeley, California.

/s/

Lauren M. Roberts

Parties

JEFF SCHNUR
SOLIX INC.
100 S. JEFFERSON ROAD PO BOX 902
WHIPPANY, NJ 07981

OLIVIA B. WEIN
ATTORNEY AT LAW
NATIONAL CONSUMER LAW CENTER
1001 CONNECTICUT AVE., NW., STE. 510
WASHINGTON, DC 20036
FOR: NATIONAL CONSUMER LAW CENTER

SHARON THOMAS
TECHNOLOGIES MANAGEMENT, INC.
210 N. PARK AVE.
WINTER PARK, FL 32789
FOR: TALK AMERICA INC.

KEVIN SAVILLE
ASSOCIATE GENERAL COUNSEL
CITIZENS/FRONTIER COMMUNICATIONS
2378 WILSHIRE BLVD.
MOUND, MN 55364

KARL ANDREW
REGULATORY AFFAIRS
SAGE TELECOM, INC.
805 CENTRAL EXPRESSWAY SO, STE 100
ALLEN, TX 75013-2789

ALAN MASON
VERIZON SERVICES ORGANIZATION, INC.
HQE01E61
600 HIDDEN RIDGE
IRVING, TX 75038

KRISTIE FLIPPO
TIME WARNER CONNECT
2805 DALLAS PKWY STE 140
PLANO, TX 75093-8720

DAVID MORIARTY
MEDIA ONE/AT&T BROADBAND
550 CONTINENTAL BLVD.
EL SEGUNDO, CA 90245

DON EACHUS
VERIZON CALIFORNIA, INC.
CA501LB
112 S. LAKE LINDERO CANYON ROAD
THOUSAND OAKS, CA 91362

JESUS G. ROMAN
ATTORNEY AT LAW
VERIZON CALIFORNIA INC
112 LAKEVIEW CANYON ROAD, CA501LB
THOUSAND OAKS, CA 91362
FOR: VERIZON CALIFORNIA, INC.

KIM F. HASSAN
ATTORNEY AT LAW
SAN DIEGO GAS & ELECTRIC COMPANY
101 ASH STREET, HQ-12
SAN DIEGO, CA 92101

ROSS A. BUNTROCK
WOMBLE CARLYLE SANDRIDGE & RICE PLLC
1401 EYE STREET, N.W. SEVENTH FLOOR
WASHINGTON, DC 20005
FOR: FONES4ALL

SEAN WILSON
TALK.COM
12020 SUNRISE VALLEY, STE.250
RESTON, VA 20191

ERIN DAWLEY
HORNITOS TELEPHONE COMPANY
PO BOX 5158
MADISON, WI 53705-0158

PETER GLASS
SEREN INNOVATIONS, INC.
414 NICOLLET MALL
MINNEAPOLIS, MN 55401

ALAN MASON
VERIZON SERVICES ORGANIZATION, INC.
HQE01E61
600 HIDDEN RIDGE
IRVING, TX 75038

KAREN BAILEY
VERIZON WEST COAST
VERIZON CALIFORNIA, INC.
HQE01G69
600 HIDDEN RIDGE DR., E01E55
IRVING, TX 75038-2092

MARY PHARO
VAR TEC TELECOM, INC.
1600 VICEROY DRIVE
DALLAS, TX 75235

JEFF COMPTON
VICE RESIDENT CARRIER RELATIONS
TELSCAPE COMMUNICATIONS INC.
606 EAST HUNTINGTON DRIVE
MONROVIA, CA 91016

JACQUE LOPEZ
LEGAL ASSISTANT
VERIZON CALIFORNIA INC
CA501LB
112 LAKEVIEW CANYON ROAD
THOUSAND OAKS, CA 91362

LORRAINE A. KOCEN
VERIZON CALIFORNIA INC.
112 S. LAKEVIEW CANYON ROAD
THOUSAND OAKS, CA 91362
FOR: VERIZON CALIFORNIA INC.

W. LEE BIDDLE
ATTORNEY AT LAW
FERRIS & BRITTON, P.C.
401 WEST A STREET, SUITE 1600
SAN DIEGO, CA 92101

FOR: SAN DIEGO GAS & ELECTRIC COMPANY

MICHAEL SHAMES
ATTORNEY AT LAW
UTILITY CONSUMERS' ACTION NETWORK
3100 FIFTH AVENUE, SUITE B
SAN DIEGO, CA 92103
FOR: TURN

JOY C. YAMAGATA
REGULATORY CASE MANAGER
SEMPRA UTILITIES
8330 CENTURY PARK COURT CP 32 D
SAN DIEGO, CA 92123

DALE DIXON
ATTORNEY AT LAW
VYCERA COMMUNICATIONS, INC.
12750 HIGH BLUFF DRIVE, SUITE 200
SAN DIEGO, CA 92129

THALIA R. GIETZEN
VYCERA COMMUNICATION, INC.
12750 HIGH BLUFF DR., STE.200
SAN DIEGO, CA 92130-2565

BRIAN PLACKIS CHENG
BLUE CASA COMMUNICATIONS
911 OLIVE STREET
SANTA BARBARA, CA 93101

ERIC WOLFE
REGULATORY
DUCOR TELEPHONE COMPANY
PO BOX 42230
BAKERSFIELD, CA 93384-2230
FOR: DUCOR TELEPHONE COMPANY

DAVE CLARK
KERMAN TELEPHONE COMPANY
811 S MADERA AVE.
KERMAN, CA 93630

LINDA BURTON
PO BOX 219
OAKHURST, CA 93644

DAN DOUGLAS
THE PONDEROSA TELEPHONE CO.
PO BOX 21
O'NEALS, CA 93645

CHRISTINE MAILLOUX
ATTORNEY AT LAW
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102
FOR: THE UTILITY REFORM NETWORK

MARGARITA GUTIERREZ
DEPUTY CITY ATTORNEY
CITY AND COUNTY OF SAN FRANCISCO
1 DR. CARLTON B. GOODLETT PLACE, RM. 375
SAN FRANCISCO, CA 94102

REGINA COSTA
RESEARCH DIRECTOR
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102
FOR: THE UTILITY REFORM NETWORK

SINDY J. YUN
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 4300
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ANNA KAPETANAKOS
SENIOR ATTORNEY AT LAW
AT&T SERVICES INC.
525 MARKET STREET, ROOM 2024
SAN FRANCISCO, CA 94105

GRETA BANKS
AT&T COMMUNICATIONS OF CALIFORNIA
525 MARKET STREET, 18TH FLOOR, 4
SAN FRANCISCO, CA 94105

LOUIE DE CARLO
COMPLIANCE MANAGER
MCI METRO ACCESS TRANSMISSION SERVICES
201 SPEAR STREET, 9TH FLOOR
SAN FRANCISCO, CA 94105

DARCY BEAL
ASSOCIATE DIRECTOR
AT&T CALIFORNIA
525 MARKET STREET, 19TH FLOOR, 21
SAN FRANCISCO, CA 94105-2727

PETER M. HAYES
DIRECTOR
AT&T CALIFORNIA
525 MARKET STREET, ROOM 1919
SAN FRANCISCO, CA 94105-2727

ENRIQUE GALLARDO
LATINO ISSUES FORUM
160 PINE STREET, SUITE 700
SAN FRANCISCO, CA 94111

JOHN L. CLARK
ATTORNEY AT LAW
GOODIN MACBRIDE SQUERI DAY & LAMPREYLLP
505 SANSOME STREET, NINTH FLOOR
SAN FRANCISCO, CA 94111
FOR: BLUE CASA COMMUNICATIONS

MARGARET L. TOBIAS
MANDELL LAW GROUP, PC
THREE EMBARCADERO CENTER, SIXTH FL.
SAN FRANCISCO, CA 94111

MARK P. SCHREIBER
ATTORNEY AT LAW
COOPER, WHITE & COOPER, LLP
201 CALIFORNIA STREET, 17TH FLOOR

FOR: COX COMMUNICATIONS

SAN FRANCISCO, CA 94111
FOR: SUREWEST TELEPHONE AND SUREWEST
TELE VIDEO

PATRICK M. ROSVALL
ATTORNEY AT LAW
COOPER, WHITE & COOPER, LLP
201 CALIFORNIA STREET, 17TH FLOOR
SAN FRANCISCO, CA 94111
FOR: THE SMALL LEC'S/SUREWEST TELEPHONE
AND SUREWEST TELEVIDEO

GLENN STOVER
ATTORNEY AT LAW
STOVER LAW
584 CASTRO ST., NO 199
SAN FRANCISCO, CA 94114-2594
FOR: ADIR INTERNATIONAL EXPORT LTD. DBA
LA CURACAO

JOHN A. GUTIERREZ
DIRECTOR OF GOVERNMENT AFFAIRS
COMCAST CABLE COMMUNICATIONS, INC.
PO BOX 5147
12647 ALCOSTA BOULEVARD, NO 200
SAN RAMON, CA 94544
FOR: COMCAST PHONE OF CALIFORNIA LLC

JOSEPHINE WONG
APEX TELECOM INC.
PO BOX 1917
OAKLAND, CA 94604

C. HONG WONG
APEX TELECOM, INC.
113 10TH STREET
OAKLAND, CA 94607

DOUGLAS GARRETT
VICE PRESIDENT, WESTERN REGION REGULATOR
COX CALIFORNIA TELCOM, LLC, DBA COX COMM
2200 POWELL STREET, SUITE 1035
EMERYVILLE, CA 94608-2618
FOR: COX CALIFORNIA TELCOM, LLC

KENECHUKWU OKOCHA
THE GREENLINING INSTITUTE
1918 UNIVERSITY AVENUE, 2ND FLOOR
BERKELEY, CA 94704
FOR: GREENLINING INSTITUTE

ROBERT GNAIZDA
POLICY DIRECTOR/GENERAL COUNSEL
THE GREENLINING INSTITUTE
1918 UNIVERSITY AVENUE, SECOND FLOOR
BERKELEY, CA 94704
FOR: THE GREENLINING INSTITUTE

THALIA N.C. GONZALEZ
LEGAL COUNSEL
THE GREENLINING INSTITUTE
1918 UNIVERSITY AVE., 2ND FLOOR
BERKELEY, CA 94704
FOR: THE GREENLINING INSTITUTE

MELISSA W. KASNITZ
DISABILITY RIGHTS ADVOCATES
2001 CENTER STREET, THIRD FLOOR
BERKELEY, CA 94704-1204
FOR: DISABILITY RIGHTS ADVOCATES

EDWARD J SCHNEIDER, JR
FORESTHILL TELEPHONE CO., INC.
4655 QUAIL LAKES DR.
STOCKTON, CA 95207

LYNNE MARTIN
PAC-WEST TELECOMM, INC.
1776 MARCH LANE, SUITE 250
STOCKTON, CA 95207

LORRIE BERNSTEIN
MOSS ADAMS LLP
3121 WEST MARCH LANE, STE. 100
STOCKTON, CA 95219-2303
FOR: PINNACLES TELEPHONE COMPANY

YVONNE SMYTHE
CALAVERAS TELEPHONE COMPANY
PO BOX 37
COPPEROPOLIS, CA 95228

LINDA COOPER
GLOBAL VALLEY NETWORKS, INC.
515 KEYSTONE BLVD.
PATTERSON, CA 95363-8861

ROSE CULLEN
THE VOLCANO TELEPHONE COMPANY
PO BOX 1070
PINE GROVE, CA 95665-1070

LINDA LUPTON
REGULATORY MANAGER
SUREWEST TELEPHONE
PO BOX 969
ROSEVILLE, CA 95678

JOLEEN HOGAN
CAL-ORE TELEPHONE COMPANY
PO BOX 847
DORRIS, CA 96023

JAMES LOWERS
THE SISKIYOU TELEPHONE COMPANY
PO BOX 157
ETNA, CA 96027

GAIL LONG
TELEPHONE COMPANY
HAPPY VALLEY/HORNITOS/WINTERHAVEN
PO BOX 1566
OREGON, OR 97045

Information Only

ADRIENNE M. MERCER
REGULATORY COMPLIANCE ANALYST
SAGE TELECOM, INC.
805 CENTRAL EXPRESSWAY S, STE 100
ALLEN, TX 75013

ANDREW L. RASURA
GOVERNMENT AND REGULATORY MANAGER
TCAST COMMUNICATIONS, INC.
24251 TOWN CENTER DR., 2ND FLOOR
VALENCIA, CA 91355

ESTHER NORTHRUP
COX CALIFORNIA TELCOM
5159 FEDERAL BLVD.
SAN DIEGO, CA 92105
FOR: COX CALIFORNIA TELCOM

GLENND KOUNTZ
REGULATORY ASSISTANT
KERNAN TELEPHONE CO.
811 S. MADERA AVENUE
KERNAN, CA 93630

CAUSBY NELSONYA
ATTORNEY AT LAW
AT&T SERVICE INC
525 MARKET STREET, SUITE 2025
SAN FRANCISCO, CA 94105
FOR: AT&T SERVICE INC

SEAN P. BEATTY
ATTORNEY AT LAW
COOPER, WHITE & COOPER, LLP
201 CALIFORNIA ST., 17TH FLOOR
SAN FRANCISCO, CA 94111
FOR: SUREWEST TELEPHONE

SUZANNE TOLLER
ATTORNEY AT LAW
DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111-6533

JESSE W. RASKIN
LEGAL ASSOCIATE
THE GREENLINING INSTITUTE
1918 UNIVERSITY AVENUE, 2ND FLOOR
BERKELEY, CA 94704
FOR: THE GREENLINING INSTITUTE

KEVIN KNESTRICK
DISABILITY RIGHTS ADVOCATES
2001 CENTER STREET, THIRD FLOOR
BERKELEY, CA 94704-1204

JOE CHICOINE
MANAGER, STATE GOVERNMENT AFFAIRS
FRONTIER COMMUNICATIONS
PO BOX 340
ELK GROVE, CA 95759

State Service

ALIK LEE
CALIF PUBLIC UTILITIES COMMISSION
COMMUNICATIONS POLICY BRANCH
ROOM 4209

GREGORY T. DIAMOND
COVAD COMMUNICATIONS COMPANY
7901 LOWRY BLVD.
DENVER, CO 80230

BETTINA CARDONA
PRESIDENT
FONES4ALL CORPORATION
6320 CANOGA AVE, SUITE 650
WOODLAND HILLS, CA 91367

R SANCHEZ
BLUE CASA COMMUNICATION
911 OLIVE STREET
SANTA BARBARA, CA 93101

JULIE WEIGAND
RICHARD HEATH AND ASSOCIATES, INC.
590 W. LOCUST AVENUE, SUITE 103
FRESNO, CA 93650

MARGARET L. TOBIAS
ATTORNEY AT LAW
MANDELL LAW GROUP, PC
THREE EMBARCADERO CENTER, SIXTH FLOOR
SAN FRANCISCO, CA 94110

KATIE NELSON
DAVIS WRIGHT TREMAINE, LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111-6533

LAW DEPARTMENT FILE ROOM
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 7442
SAN FRANCISCO, CA 94120-7442

STEPHANIE CHEN
LEGAL ASSOCIATE
THE GREENLINING INSTITUTE
1918 UNIVERSITY AVENUE, 2ND FLOOR
BERKELEY, CA 94704
FOR: THE GREENLINING INSTITUTE

CHARLES E. BORN
MANAGER-STATE GOVERNMENT AFFAIRS
FRONTIER, A CITIZENS TELECOMMUNICATIONS
PO BOX 340
ELK GROVE, CA 95759

ANGELA YOUNG
CALIF PUBLIC UTILITIES COMMISSION
FISCAL & ADMINISTRATIVE SERVICES
AREA 3-B

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

BENJAMIN SCHEIN
CALIF PUBLIC UTILITIES COMMISSION
PROGRAM MANAGEMENT & IMPLEMENTATION BRAN
AREA 3-D
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

DONNA L. WAGONER
CALIF PUBLIC UTILITIES COMMISSION
UTILITY AUDIT, FINANCE & COMPLIANCE BRAN
AREA 3-C
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

HIEN VO
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 4107
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JOSIE WEBB
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

KATHERINE S. MOREHOUSE
CALIF PUBLIC UTILITIES COMMISSION
PROGRAM MANAGEMENT & IMPLEMENTATION BRAN
AREA 3-D
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

RISA HERNANDEZ
CALIF PUBLIC UTILITIES COMMISSION
ENERGY PRICING AND CUSTOMER PROGRAMS BRA
ROOM 4209
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

SEAN WILSON
CALIF PUBLIC UTILITIES COMMISSION
UTILITY AUDIT, FINANCE & COMPLIANCE BRAN
AREA 3-C
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

CHERRIE CONNER
CALIF PUBLIC UTILITIES COMMISSION
PROGRAM MANAGEMENT & IMPLEMENTATION BRAN
AREA 3-D
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

HAZLYN FORTUNE
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 5303
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JESSICA T. HECHT
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 5113
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

KAREN JONES
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 2106
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

NATALIE BILLINGSLEY
CALIF PUBLIC UTILITIES COMMISSION
COMMUNICATIONS POLICY BRANCH
ROOM 4108
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ROBERT HAGA
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 5304
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214